

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

MDL NO. 3076

CASE NO. 1:23-MD-03076-KMM

IN RE:

FTX Cryptocurrency Exchange Collapse Litigation

THIS DOCUMENT RELATES TO:
PROMOTERS AND DIGITAL CREATORS

**MDL PLAINTIFFS' SUPPLEMENT TO
REQUEST FOR STATUS CONFERENCE AND NOTICE OF PROPOSED AGENDA**

On May 15, 2024 and June 20, 2024 the Court entered orders [ECF Nos. 676, 377, 678, 704] staying “the Riot Complaint” (*Edwin Garrison et al. v. Riot Games, Inc. et al.*, Case No. 1:24-cv-21296-KMM, ECF 1); “the Mercedes Complaint” (*Garrison et al v. Mercedes-Benz Grand Prix Limited*, No. 1:23-cv-24480-KMM, ECF 1); “the Furia Complaint” (*Garrison et al. v. Furia Esports LLC et al.*, Case No. 1:24-cv-20895-RS, ECF 1); “the Monumental Complaint” (*Garrison et al. v. Lincoln Holdings LLC*, Case No. 1:24-cv-00655-JMC (D.D.C.), ECF 1); and “the MLB Complaint” (*Garrison v. Major League Baseball*, 23-cv-24479, ECF 1) pending a resolution of the S&E Defendants’ Motion to Dismiss [ECF 271].

In each order, the Court ordered the Parties to propose a briefing schedule within 14 days after entry of that order.

On May 7, 2025, the Court entered an Order denying in part the motion to dismiss [ECF No. 890].

On May 12, 2025, the MDL Plaintiffs filed a Request for Status Conference. [ECF No. 896]. In the Request for Status Conference, Plaintiffs state they seek guidance from the Court regarding:

1. Whether those additional Celebrity and Promoter Defendants should and could be joined into the Amended Complaint, currently due May 28, 2025; and
2. Whether discovery may proceed against those additional Celebrity and Promoter FTX Defendants, given MDL Plaintiffs assert substantially similar causes of action against them, including the Florida Securities Claim.
3. MDL Plaintiffs would respectfully like to serve these named FTX Celebrity Promoters the same discovery, as the other FTX Celebrity Promoters and include them in the Amended Complaint.

Since filing the Request for Status Conference, MDL Plaintiffs have been conferring with counsel for the Promoter Defendants on the next steps in the litigation. While the Promoter Defendants have stated they wholly oppose lifting any stay of discovery at this time, conferral is ongoing as to the schedule for briefing the remaining motions to dismiss, as well as the timing for responding to MDL Plaintiffs' amended complaint, when filed. MDL Plaintiffs anticipate moving to extend the deadlines for briefing schedules before the current May 21, 2025 deadline, and potentially moving to extend the deadline to file their further amended Consolidated Promoter Complaint pending the Court's ruling on Plaintiffs' Request for Status Conference.

MDL Plaintiffs respectfully submit a status conference will be helpful in aiding the Parties in determining whether (1) the Promoter track will continue with separate complaints, and thus multiple additional rounds of motions to dismiss briefing, (2) whether the Promoter track should be fully consolidated into a single complaint, further streamlining the litigation in light of the Court's recent Order, and (3) whether and to what extent discovery will now proceed.

Dated: May 16, 2025

By: /s/ Adam Moskowitz

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Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the forgoing was filed on May 16, 2025, via the Court's CM/ECF system, which will send notification of such filing to all attorneys of record.

By: /s/ Adam Moskowitz

Adam Moskowitz